

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167
Chapter 7

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee
of the Bankruptcy Estate of Pro-Mark Services, Inc.,
as Administrator of the Pro-Mark
Services, Inc. Employee Stock Ownership Plan, and
as Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable
Living Trust, Kyle R. Berg Revocable Living Trust,
Chad DuBois, Mandy Grant, and Miguel Paredes,

Defendants.

**STIPULATED MOTION TO EXTEND PLAINTIFF'S TIME TO RESPOND TO
DEFENDANT MANDY GRANT'S MOTION TO DISMISS**

1. Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust filed his Adversary Complaint against the Defendants, including Defendant Mandy Grant, and the Court issued a Summons, on August 26, 2024. [ECF Nos. 1, 2.] Plaintiff filed an Amended Complaint on September 25, 2024. [ECF No. 11.]

2. The Court granted three stipulated motions to extend the deadline for Defendant Grant to file an answer or other response to the Amended Complaint. [See ECF Nos. 19, 38, 65.] As a result, Defendant Grant's answer/response deadline was January 20, 2025.

3. On January 20, 2025, Defendant Grant filed a motion to dismiss the Amended Complaint (the "Grant Motion to Dismiss"). [ECF No. 75.]

4. Plaintiff has requested that Defendant Grant stipulate to an extension of Plaintiff's time to file a response to the Grant Motion to Dismiss to February 12, 2025. Defendant Grant has no objection to this request.

5. Accordingly, Plaintiff and Defendant Grant hereby move the Court, by stipulation, for an order extending the deadline for Plaintiff to file a response to the Grant Motion to Dismiss to February 12, 2025.

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Dated: January 31, 2025

/e/ Peter D. Kieselbach

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Dated: January 31, 2025

/e/ Brian D. Larson

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CERTIFICATE OF SERVICE

The undersigned certifies that on January 31, 2025, the above document was served on all counsel of record via CM/ECF.

/e/ Peter D. Kieselbach

Peter D. Kieselbach